

# UOIG Medicaid Fraud, Waste, and Abuse Prevention Training

These slides accompany the  
2022 UOIG FWA Prevention Training.

Please attend the training to fulfil your training requirement for  
Medicaid Fraud, Waste, and Abuse Prevention

The logo for the Utah Office of Inspector General (UOIG) features a dark blue square with a white magnifying glass icon. Inside the magnifying glass, the letters "OIG" are written in a light blue, sans-serif font.

Utah Office of  
Inspector General



The UOIG is an Independent Office.

Utah Code 63A-13 prohibits interference with an Audit or an Investigation, or with the outcomes of reporting by the UOIG

# UOIG Goal

Eliminate Medicaid Fraud, Abuse,  
and Waste

# UOIG Mission

The Office of Inspector General of Medicaid Services will protect taxpayer dollars by identifying fraud, abuse, and waste risks and vulnerabilities in the State Medicaid Program and by taking action to mitigate or eliminate those risks.

# UOIG Mission



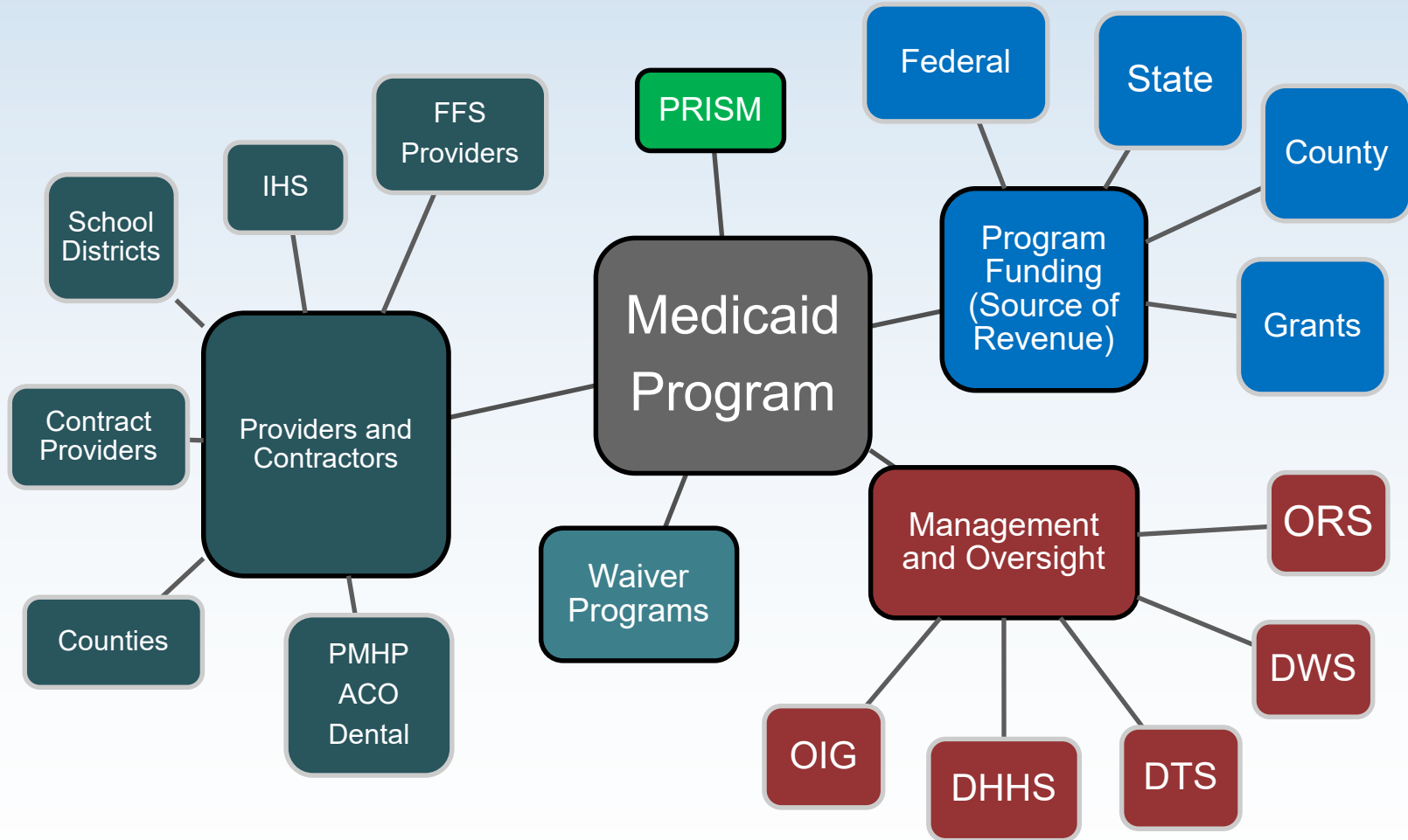
Policy  
Recommendations  
& Procedural  
Opportunities



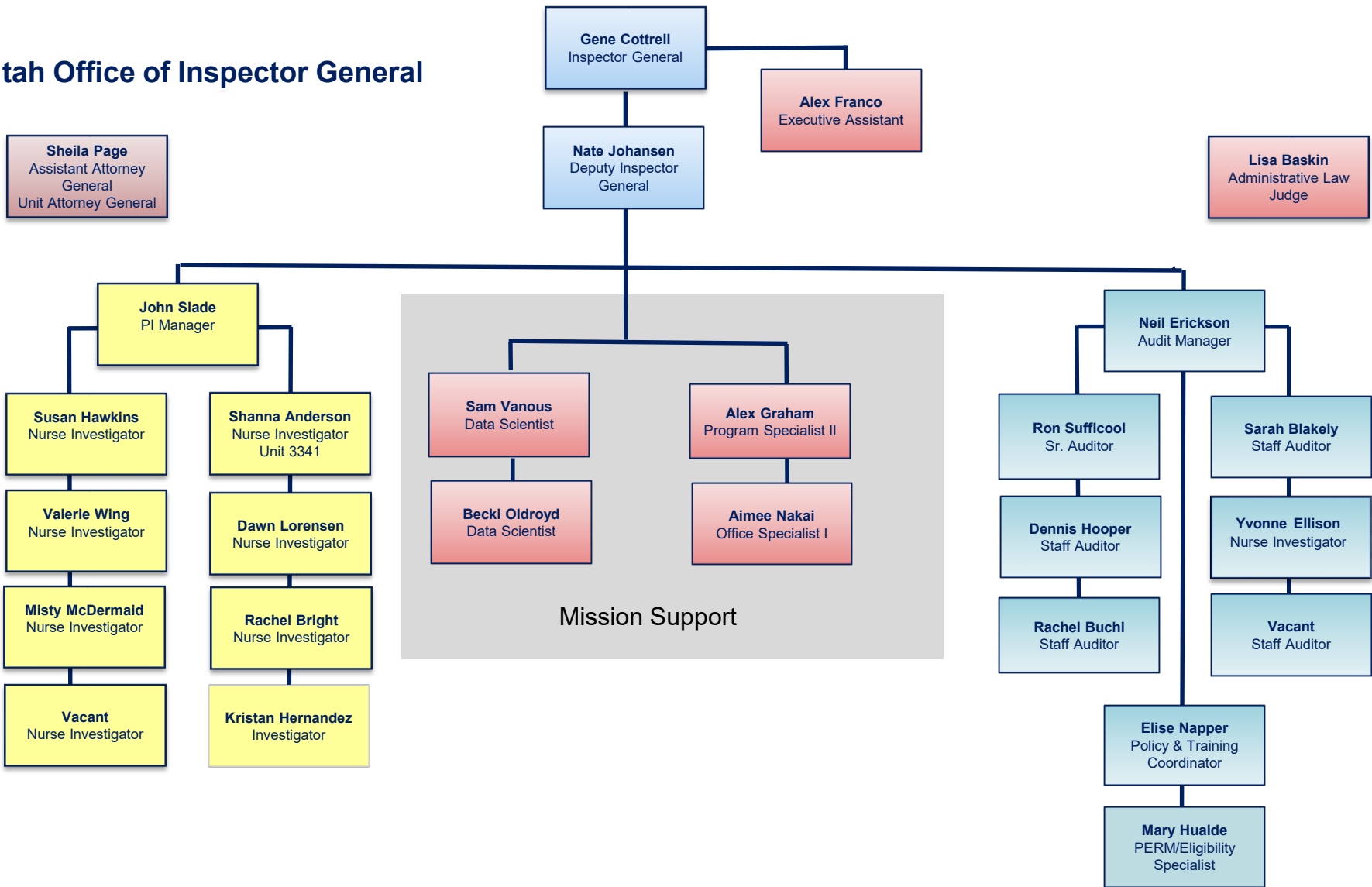
Review of  
Claims History



# UOIG Oversight Universe



# Utah Office of Inspector General



# UOIG Audit Team

- Must Remain Completely Independent
- Looks at the Overall Picture
- Reviews Policy and Procedure
- Reviews what has Occurred
- Issues Findings, Makes Recommendations



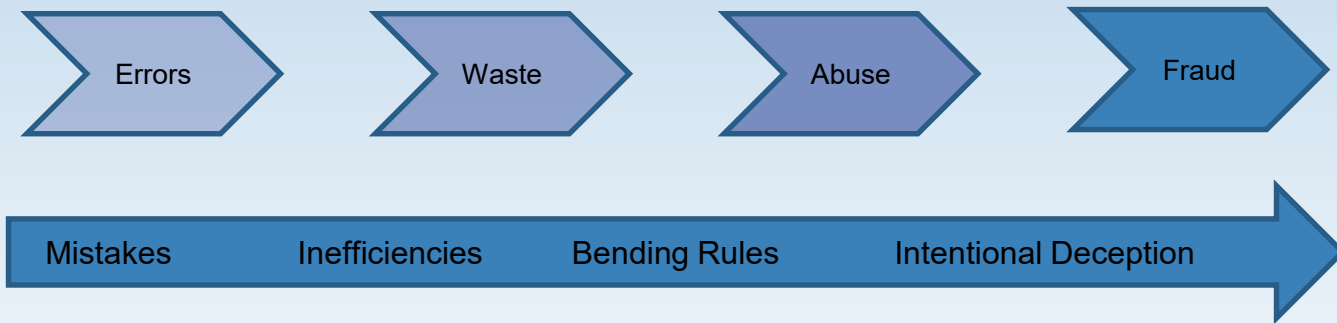


# UOIG Investigations / Program Integrity

- Receives Complaints
- Conducts Preliminary Investigations & Claims Reviews
- Identifies Overpayment Amounts
- Issues Notices of Recovery
- Responsible for Program Integrity Initiatives



# Causes of Improper Payments



UOIG identifies all causes of improper payments

Most common payment errors:

- Insufficient documentation
- Unintentional billing errors

# Perpetrators of Fraud

## Who might perpetrate fraud against Medicaid?

Fraud schemes can come from anyone that has the ability to influence or change the outcome of billing, services, eligibility, or records.

# Common Examples of Provider Fraud, Waste, and Abuse



- Billing for services not rendered and/or supplies not provided
- Double billing
- Coding schemes:
  - Unbundling
  - Upcoding
- Altering medical documentation
- Altering claim forms
- Misrepresentation of medical conditions or services
- Soliciting, offering or receiving a kickback, bribe or rebate
- Failure to report third party liability in billing

# **Some of the Medicaid Programs with high levels of risk for Fraud, Waste, and Abuse**



# Personal Care / Home Health



# Transportation

# **Mitigating the risk of Fraud, Waste, and Abuse in Personal Care and Home Health Services**





# Electronic Visit Verification

# Common Fraud and Abuse Schemes



# Balance Billing Schemes



# Unlikely and Impossible Hours Schemes



# Ghost Employee Schemes



# Drug Diversion Schemes



# Beneficiary Eligibility Schemes



# COVID-19 Testing Schemes





# COVID-19 Treatment and Prevention Schemes



# Telehealth Schemes



# Reassignment of Billing Schemes Target Providers Directly

# Regulations, Responsibilities, and Resources

# List of Excluded Individuals/ Entities



- The LEIE is a regularly updated list of individuals who are excluded from receiving Medicaid payments and reimbursement.
- Anyone who hires an individual or entity on the LEIE may be subject to civil monetary penalties.
- The UOIG recommends regular, routine checks of the LEIE, to ensure that staff and contractors are not listed

# False Claims and Fiscal Responsibility

- Deficit Reduction Act
- Federal False Claims Act
- Utah's False Claims Act
- *Qui Tam*/Whistleblower Protections
- Provider Agreements
- Medicaid Contractual Obligations





A person who knowingly submits a false claim is liable for three times the amount of the federal government's damages plus penalties of \$5,000 to \$10,000 per claim.

# What is a whistle blower?



The Whistleblower Protection Act  
Qui Tam Incentives





# You Have a Duty to Report

Pursuant to Utah Code 63A-13-501, “A health care professional, a provider, or a state or local government official or employee who becomes aware of fraud, waste, or abuse shall report the fraud, waste, or abuse to the Office”

# Reporting to the UOIG

Suspected Fraud, Waste or Abuse may be reported to The Utah Office of Inspector General.

Reports can come from anyone and can be anonymous.

Please call the UOIG Hotline:

**(855) 403-7283**

Or complete a referral on the UOIG website:

<https://oig.utah.gov/>

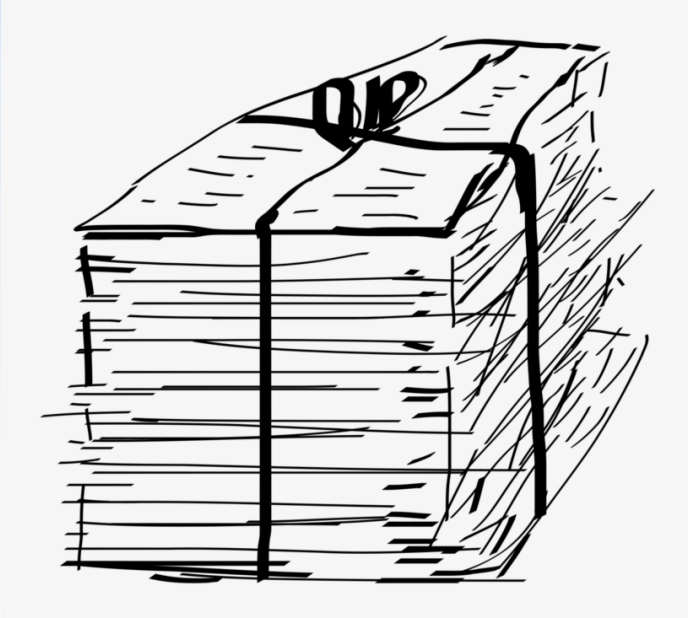
# Compliance Resources

Medicaid Policies Change Frequently

- Medicaid Information Bulletins (MIBs)
- Medicaid Provider Manuals
- Utah State Bulletin/Utah Administrative Rules
- CMS
- HHS OIG Compliance Series



# Records Requests



- Records must be submitted within 30 calendar days
- Ensure your contact information in PRISM remains up-to-date
- If you are teleworking due to COVID, update your contact information and/or be sure to check your office mail and voicemail regularly

# UOIG Contacts

Gene Cottrell

Utah Inspector General

[gcottrell@utah.gov](mailto:gcottrell@utah.gov)

John Slade

Program Integrity

Manager

[jslade@utah.gov](mailto:jslade@utah.gov)

Elise Napper

Auditor IV - Policy

Analyst & Trainer

[enapper@utah.gov](mailto:enapper@utah.gov)





## Any questions?

Elise Napper

Auditor IV - Policy Analyst & Trainer

801-538-6536 / 801-540-6886

[enapper@utah.gov](mailto:enapper@utah.gov)